

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

FILED
RICHARD W. NAGEL
CLERK OF COURT

2021 JUN 25 PM 12:16

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

2:21-mj-438

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

U.S. Postal Service Priority Express Mail parcel bearing label no.
EJ830634658US addressed to Kobe Freeman, 613 Pine St. Apt
B, Steubenville, OH 43952 bearing return address Joseph
Freeman, 17033 Canvas St. Canyon Country, CA 91387

Case No.

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

U.S. Postal Service Priority Express Mail parcel bearing label no. EJ830634658US addressed to Kobe Freeman, 613 Pine St. Apt B, Steubenville, OH 43952 bearing return address Joseph Freeman, 17033 Canvas St. Canyon Country, CA 91387

located in the _____ District of _____, there is now concealed (identify the person or describe the property to be seized):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1) and 843(b).

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
Title 21 USC 841(a)(1)

Offense Description
Possession with intent to distribute
a controlled substance

Title 21 USC 843(b)

Prohibited use of a communication center (U.S. Mail)

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector BRYON GREEN

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

BRYON GREEN, U.S. Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
(specify reliable electronic means)

June 25, 2021

Date: _____

City and state: Columbus, Ohio

Kimberly A. Johnson

United States Magistrate Judge



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF:

U.S. Postal Service Priority Express Mail
parcel bearing label no. EJ830634658US
addressed to Kobe Freeman, 613 Pine St.
Apt B, Steubenville, OH 43952 bearing a
return address of, Joseph Freeman, 17033
Canvas St. Canyon Country, CA 91387.

Case No. _____

MAGISTRATE JUDGE
KIMBERLY A. JOLSON

Affidavit in Support of Application for Search Warrant

I, BRYON GREEN, DO HEREBY DEPOSE AND SAY:

1. I am a United States Postal Inspector and have been so employed since October 2006, presently assigned at Cleveland, Ohio to investigate Prohibited Mailing offenses. I have received training in the detection and investigation of prohibited mailing offenses. I have worked U.S. Postal Service related investigations for approximately 14 years, during which time I have been the case agent for investigations leading to prosecution in U. S. District Court, as well as state courts.
2. I know from my training and experience, and the training and experience of other Postal Inspectors, I am aware the U.S. Mail is often used by drug traffickers to transport controlled substances as well as U.S. currency derived from their illicit activities, either as proceeds and/or payment. I know from my training and experience the Priority Mail Express system is commonly used to transport controlled substances and associated currency because Priority Mail Express provides traceability, reliability, and timely delivery. The guaranteed delivery timeframe of Priority Express Mail places time pressures on law enforcement agents to identify, search, and deliver these drug parcels in a timely manner.
3. As a result of past investigations and prosecutions, the Postal Inspection Service has determined that a number of indicators can be used to identify packages containing contraband that have been entered into the Priority Mail Express network. Inspectors routinely review shipment documents and Priority Mail Express packages originating from or destined to drug source areas, to identify instances where there is a possibility of drug trafficking.

4. On or about June 23, 2021, Postal Inspectors identified U.S. Postal Service Priority Mail Express parcel bearing label no. EJ830634658US addressed to, Kobe Freeman, 613 Pine St. Apt B, Steubenville, OH 43952 bearing a return address of, Joseph Freeman, 17033 Canvas St. Canyon Country, CA 91387, which was believed to contain narcotics, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance) and 843(b) (illegal use of mail in furtherance of narcotics trafficking). Inspectors identified this as a suspected drug parcel based on several characteristics, including but not limited to type of mail, origin, destination, label, postage, and size.
5. On June 24, 2021, Postal Inspectors intercepted U.S. Postal Service Priority Mail Express parcel bearing label no. EJ 830634658 US. The subject parcel is further described as a brown card board box, weighing approximately 16 pounds. The subject parcel was mailed on June 22, 2021, from the Canyon Country, CA 91387 Post Office, and bore \$166.45 U.S. Currency paid postage.
6. The subject parcel did not require a signature for delivery. Signature waivers are commonly used on drug parcels so the intended recipients do not have to have contact with the delivery employee and/or law enforcement should the parcel be seized.
7. Your affiant ran the subject parcel label names and addresses in CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information and was unable to associate Kobe Freeman at 613 Pine St. Apt B, Steubenville, OH 43952 or Joseph Freeman at 17033 Canvas St. Canyon Country, CA 91387 in CLEAR.
8. Your Affiant knows based on his training and experience, that individuals using the U. S. Mails for the purpose of transporting controlled substances will often place fictitious address and/or name information, different variations of their names, names of deceased individuals, or no names at all on these parcels to conceal their true identities from law enforcement should the parcel be seized.
9. Your Affiant knows based on training and experience that California is a common origination area for controlled substances sent through the U.S. Mail with the Northern Ohio area being a common destination point for controlled substances sent through the U.S. Mail.
10. Your Affiant knows from training and experience that individuals who regularly handle controlled substances often leave the scent of controlled substances, for which narcotic-sniffing canines are trained to indicate alert, on the box, contents of the box, and/or other packaging material they handle.

11. On June 24, 2021, the subject parcel was subjected to "Ayko", a narcotic detection canine handled Officer J. David Jones, Columbus, Ohio Police Department. According to Officer Jones, this positive alert meant Ayko detected the odor of an illegal drug emanating from the parcels.
12. Officer Jones and narcotics Ayko have worked together since November 2015. Jones and canine Ayko were both recertified on April 27, 2021 by the Ohio Peace Officers Training Academy (OPOTA). Canine Ayko completed 200 hours of training at Gold Shield Training Kennels, Blacklick, Ohio, a well established and regarded training facility for police canines. During this time, Ayko was trained and certified to alert to the presence of the odors from marijuana, cocaine, hashish, cocaine, heroin, methamphetamine ("crystal meth"), and/or their derivatives. Officer Jones has been trained how to handle a detector K-9 and read his alerts. According to Officer Jones, Ayko is a reliable K-9 assist unit.
13. Based on the information contained herein, your affiant maintains there is probable cause to believe that the U.S. Postal Service Priority Mail Express parcel bearing label no. EJ830634658US addressed to, Kobe Freeman, 613 Pine St. Apt B, Steubenville, OH 43952 bearing a return of, address Joseph Freeman, 17033 Canvas St. Canyon Country, CA 91387 contains controlled substances, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).



Bryon Green
United States Postal Inspector

On June 25th, 2021 this affidavit was sworn to by the affiant, who did no more than attest to its contents pursuant to Crim. R. 4.1 (b)(2)(A), by telephone after a document was transmitted by email, per Crim R. 4.1.



Kimberly A. Johnson
United States Magistrate Judge

